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File Number:

September 18, 2019

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VIA ECF

Hon. Christian F. Hummel
U.S. Magistrate Judge
U.S. District Court, Northern District of New York
James T. Foley Courthouse
445 Broadway, Room 441
Albany, NY 12207

Re: AngioDynamics, Inc. v. C.R. Bard, Inc. et al., No. 1:17-cv-0598 (BKS/CFH)

Dear Judge Hummel:

The parties have met and conferred since the September 11, 2019 conference and have made significant progress towards resolving their disputes about AngioDynamics' responses to Defendants' interrogatories. AngioDynamics will amend its interrogatory responses, and although Defendants believe certain of those amendments (as previewed to counsel) still will be insufficient, they will amend their 30(b)(6) notice and seek to obtain the additional information they need through the AngioDynamics 30(b)(6) deposition that is currently scheduled for October 22. Accordingly, Defendants are not filing a motion by today's deadline but respectfully request the opportunity to seek relief promptly after October 22 should AngioDynamics' 30(b)(6) testimony be inadequate.

Respectfully submitted,

/s/ Edward Moss

Edward Moss
Partner
of O'MELVENY & MYERS LLP

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cc: All counsel